1	Deverie J. Christensen Nevada State Bar No. 6596	
2	JACKSON LEWIS P.C. 300 South Fourth Street, Suite 900	
3	Las Vegas, Nevada 89101 Tel: (702) 921-2460	
4	Email: deverie.christensen@jacksonlewis.com	
5	Attorney for Defendant Ecolab, Inc.	
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7	UNITED STATES DISTRICT COURT	
8	DISTRICT OI	F NEVADA
9	JENNIFER COUNCILL, an individual,	Case No. 2:21-cv-01889-JAD-EJY
10	Plaintiff,	
11	VS.	STIPULATION AND ORDER TO SUBMIT MATTER TO BINDING
12	ECOLAB, INC., a foreign Corporation, DOES 1-50, inclusive and ROE CORPORATIONS 1-	ARBITRATION AND STAY ACTION PENDING ARBITRATION
13	50, inclusive,	
14	Defendants.	ECF No. 4
15	IT IS HEREBY STIPULATED by and b	etween Plaintiff Jennifer Councill ("Plaintiff")
16	•	Attorneys LLP, and Defendant Ecolab
17	Inc.("Defendant"), through its counsel Jackson Lewis P.C., as follows:	
18		ed a complaint alleging wage and hour claims
19	under federal and state law, and noting Plaintiff intends to amend the complaint to add disability	
20	discrimination claims under federal and state law once administrative exhaustion is completed.	
21	2. Defendant's response to the Complaint is currently due on November 5, 2021.	
22	3. Plaintiff and Defendant have determined the Parties entered into an arbitration	
23	agreement requiring Plaintiff and Defendant to submit to final and binding arbitration any and all	
24	claims and disputes that arise from or relate to Plaintiff's employment or termination of he	
25	employment with Defendant (the "Arbitration Ag	• •
26	by Plaintiff against Defendant in the Action fall v	
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1	4. Thus, the Parties have agreed th	at the Action, in its entirety, shall be submitted to
2	binding arbitration pursuant to the terms of the Arbitration Agreement, with AAA; and Plaintiff	
3	will initiate arbitration against Defendant with AAA.	
4	5. All proceedings in this Action shall be stayed and this Court shall retain jurisdiction	
5	over this Action pending the conclusion of the arbitration with AAA.	
6	6. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed	
7	as waiving any claim and/or defense held by any party.	
8	Dated this 3rd day of November, 2021.	
9	HKM EMPLOYMENT ATTORNEYS	JACKSON LEWIS P.C.
10	/s/ Dana Sniegocki	/s/ Deverie J. Christensen
11	Jenny L. Foley, Ph.D., Esq., Bar No. 9017 Dana Sniegocki, Esq., Bar No. 11715	Deverie J. Christensen, Bar No. 6596 300 S. Fourth Street, Ste. 900
12	1785 E. Sahara, Suite 300 Las Vegas, Nevada 89104	Las Vegas, Nevada 89101
13	Attorneys for Plaintiff	Attorneys for Defendant
14		
15	<u>ORDER</u>	
16	Based on the parties' stipulation [ECF No. 4], IT IS SO ORDERED. This case is stayed	
10	nonding the completion of hinding arbitrati	ion proceedings. The Clark of Court is
17	pending the completion of binding arbitrati directed to ADMINISTRATIVELY CLOSI	E this case. Any party who desires to seek
		E this case. Any party who desires to seek
17	directed to ADMINISTRATIVELY CLOSI	E this case. Any party who desires to seek
17 18	directed to ADMINISTRATIVELY CLOSI further action in this case will first have to	E this case. Any party who desires to seek file a motion to reopen it.  S. District Judge Jennifer A. Dorsey
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